

IN THE UNITED STATES DISTRICT COURT
FOR THE ~~WESTERN~~ DISTRICT OF OKLAHOMA

Northern

1. AMAYA RASHEED,)

Plaintiff,)

v.)

1. TEEN CHALLENGE OF)
OKLAHOMA, INC., d/b/a)
ADULT AND TEEN)
CHALLENGE)
OF OKLAHOMA,)

2. MICHAEL LOKEY, in his)
individual and official capacity,)

3. DEBORAH SHECKLES, in her)
individual and official capacity,)

4. BRITTANY VIRTUE, in her)
individual and official capacity,)

5. RACHEL NICHOLSON, in her)
individual and official capacity,)

6-15. JOHN/JANE DOE, in their)
individual and official capacity,)

Defendants.

COMPLAINT

Plaintiff Amaya Rasheed respectfully files her Complaint against Defendants Teen Challenge of Oklahoma, Inc., d/b/a Adult and Teen Challenge of Oklahoma, Michael Lokey, Deborah Sheckles, Brittany Virtue, Rachel Nicholson, and John and Jane Doe(s).

21 CV - 274 GKF • CDL

Case No. _____

JURY TRIAL DEMANDED

FILED

JUL 06 2021

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

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The Parties, Jurisdiction, and Venue

1. Plaintiff Amaya Rasheed (**"Plaintiff"** or **"Rasheed"**), who turned 18 years old in or around March 7, 2021, resides in Medford, Suffolk County, New York.

2. Defendant Teen Challenge of Oklahoma, Inc. (**"Defendant"** or **"Teen Challenge"**) is an Oklahoma non-profit corporation that does business as Adult and Teen Challenge of Oklahoma in Eucha, Delaware County, Oklahoma.

3. Defendant Michael Lokey (**"Lokey"**) is sued in his individual and official capacity. At all times material to this action, Lokey was the Executive Director of Teen Challenge. Lokey resides in Delaware County, Oklahoma.

4. Defendant Deborah Sheckles (**"Sheckles"**) is sued in her individual and official capacity. At all times material to this action, Sheckles was employed by Teen Challenge. Sheckles resides in Delaware County, Oklahoma.

5. Defendant Brittany Virtue (**"Virtue"**) is sued in her individual and official capacity. At all times material to this action, Sheckles was employed by Teen Challenge. Virtue resides in Delaware County, Oklahoma.

6. Defendant Rachel Nicholson (**"Nicholson"**) is sued in her individual and official capacity. At all times material to this action, Nicholson

was employed by Teen Challenge. Nicholson resides in Delaware County, Oklahoma.

7. Defendants John and Jane Doe(s) are not yet identifiable to Rasheed, but will be properly named once they are discovered.

3. The Court has diversity of citizenship jurisdiction under 28 U.S.C. § 1332. Plaintiff is a resident of New York. Defendant Teen Challenge is an Oklahoma non-profit corporation with its principal place of business in Oklahoma. All other Defendants also reside in Oklahoma. Therefore, complete diversity of citizenship exists. The amount in controversy, exclusive of interest and costs, exceeds the sum or value of \$75,000.00.

4. Venue is proper in this Court under 28 U.S.C. § 1391(b) because Defendants are located in this District and a substantial part of the events on which the claims asserted are based occurred in this District.

Statement of the Claim

5. On or about May 25, 2020, Rasheed's parents, Sabreena Singh and Abdool Rasheed, submitted an application to Teen Challenge on behalf of Rasheed, who was seventeen (17) years old at the time, to undergo therapeutic services while completing her final year of high school.

6. Teen Challenge is a long-term residential recovery program for adolescents struggling with addiction, depression, anxiety, anger, and other life-controlling problems.

7. Teen Challenge's programs last an average of twelve to eighteen (12-18) months.

8. Rasheed's parents chose Teen Challenge for numerous reasons, including being told by the program that it was equipped in handling adolescents such as Rasheed.

9. Another reason they chose Teen Challenge was due to its ability to accommodate Rasheed's religion.

10. Mrs. Singh and Mr. Rasheed told Teen Challenge that Rasheed could not eat pork due to her Muslim faith.

11. Although Teen Challenge is a Christian-based program, it agreed to accommodate Rasheed's religious dietary needs prior to Rasheed arriving to Teen Challenge.

12. Teen Challenge also told Rasheed's parents that Teen Challenge was a female-only facility.

13. Both males and females are present at Teen Challenge's facility.

14. Shortly after submitting the application, Teen Challenge sent an Acceptance Packet from Executive Director Michael Lokey ("**Lokey**"), which provided the monthly tuition amount, additional forms to be completed, a packing list, and directions to the facility.

15. Teen Challenge agreed to keep Rasheed for not less than one year, unless Mrs. Singh and/or Mr. Rasheed decided otherwise.

16. On or about June 19, 2020, Rasheed's parents took Rasheed to Teen Challenge's facility and left her in the care of Teen Challenge.

17. Rasheed was in Teen Challenge's program for one (1) month, from June 19, 2020, through July 20, 2020.

18. While Rasheed was in Teen Challenge's program, Defendants were responsible for her well-being.

19. During Rasheed's stay, Rasheed repeatedly suffered mental and physical abuse at the hands of Teen Challenge and its employees, including Sheckles, Virtue, and Nicholson.

20. After Rasheed arrived, she was forced to shower while a Teen Challenge employee watched her.

21. While at Teen Challenge, Rasheed was physically restrained against her will by Teen Challenge employees, including Virtue and Nicholson, sometimes to the point where she could not breathe.

22. On at least one occasion, Sheckles hit Rasheed in the face.

23. During one encounter, Nicholson sat on Rasheed's body, pinning Rasheed to the floor.

24. Rasheed repeatedly told Nicholson that she could not breathe, but the Nicholson continued to sit on her, holding her down.

25. While on top of Rasheed, Nicholson bit Rasheed's finger, drawing blood.

26. At the same time, another employee was twisting her ankles, causing Rasheed immense pain.

27. Rasheed did not consent to the physical abuse or the unlawful restraint by Teen Challenge.

28. Although Rasheed explained to Defendants that she suffers from frequent urinary tract infections, Defendants denied Rasheed bathroom privileges when she requested them.

29. Defendants denied Rasheed medical care when she was feeling ill or was hurt from the physical abuse of Teen Challenge's staff members.

30. Defendants did not accommodate Rasheed's religious dietary needs, forcing her to eat pork during her stay.

31. Defendants gave Rasheed no other choice but to eat pork on the days when that was being served.

32. During one meal with pork, one of Teen Challenge's employees told Rasheed that if she were mad at her parents, she'd go ahead and eat the pork.

33. Eating pork was against Rasheed's religious beliefs and caused her severe emotional distress.

34. Teen Challenge also refused to allow Rasheed her weekly phone call to her parents on at least one (1) occasion.

35. On or about July 6, 2020, Teen Challenge contacted Mrs. Singh and told her the program was dismissing Rasheed.

36. During Rasheed's stay, Lokey, Sheckles, Virtue, Nicholson, and John and Jane Doe(s) were acting within the scope of their employment.

37. Alternatively, Lokey, Sheckles, Virtue, Nicholson, and John and Jane Doe(s) were acting outside the scope of their employment.

38. Rasheed suffered damages because of Defendants' conduct, including actual damages, emotional distress and/or other damages.

39. Rasheed is entitled to punitive damages because Defendants acted intentionally, willfully, wantonly, maliciously, or in reckless disregard of Rasheed's rights.

40. Rasheed also seeks to recover attorney's fees, costs, pre-judgment interest, post-judgment interest, and all other relief allowed by law or equity.

Assault and Battery

41. Defendants' numerous gestures and contact to Rasheed were unauthorized, improper, harmful, and offensive.

42. Without Rasheed's consent, Defendants acted with the intent of making a harmful or offensive contact with Rasheed and/or with the intent of putting Rasheed in apprehension of such contact.

43. Defendants' conduct placed Rasheed in apprehension of an immediate harmful or offensive contact.

44. Defendants' conduct resulted in a harmful or offensive contact with Rasheed.

45. As a result of Defendants' offensive gestures and contact, Rasheed has experienced physical injury, severe emotional and mental stress, and anxiety.

46. Rasheed suffered both fright and terror due to Defendants' conduct.

False Imprisonment

47. Defendants detained Rasheed against her will numerous times during her stay at the facility.

48. Defendants' detention of Rasheed was unlawful.

49. As a result of Defendants' unlawful detention, Rasheed has experienced severe emotional and mental stress, and anxiety.

Intentional Infliction of Emotional Distress

50. During Rasheed's stay, Defendants acted intentionally and recklessly.

51. Defendants' conduct was extreme and outrageous.

52. Defendants' conduct caused Rasheed severe emotional distress.

Negligence

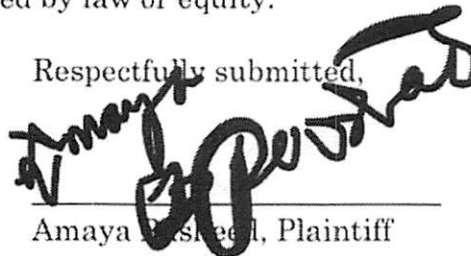
53. Defendants had a duty to protect Rasheed from injury.

54. Defendants failed to perform that duty.

55. Due to Defendants' failure, Rasheed suffered physical injury, severe emotional and mental stress, and anxiety.

WHEREFORE, Plaintiff Amaya Rasheed prays the Court enter final judgment against Defendant Teen Challenge of Oklahoma, Inc., doing business as Adult and Teen Challenge of Oklahoma, and award damages in excess of \$75,000.00, exclusive of interest and costs, in the form of actual damages, emotional distress damages and punitive damages. Further, Plaintiff prays the Court award her attorney's fees, costs, pre-judgment interest, post-judgment interest, and all other relief allowed by law or equity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Amaya Rasheed', is written over a horizontal line.

Amaya Rasheed, Plaintiff

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